

UNITED STATES DEPARTMENT OF JUSTICE
WASHINGTON, D.C. 20530

SUPPLEMENTAL STATEMENT

Pursuant to Section 2 of the Foreign Agents
Registration Act of 1938, as Amended

JAN 19 1980

For Six Month Period Ending _____

(Insert date)

RECEIVED
JAN 25 3 36 PM '80
DEPT. OF JUSTICE
REGISTRATION UNIT
INTERNAL SECURITY
SECTION
CRIMINAL DIVISION

Name of Registrant

Registration No. 1648

SONTHEIMER AND COMPANY, INC., also d/b/a St. Maarten's Tourist
Information Office, also d/b/a Ghana Tourist Office

Business Address of Registrant

445 Park Avenue
New York, New York 10022

I - REGISTRANT

1. Has there been a change in the information previously furnished in connection with the following:

(a) If an individual:

(1) Residence address	Yes <input type="checkbox"/>	No <input type="checkbox"/>
(2) Citizenship	Yes <input type="checkbox"/>	No <input type="checkbox"/>
(3) Occupation	Yes <input type="checkbox"/>	No <input type="checkbox"/>

(b) If an organization:

(1) Name	Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/>
(2) Ownership or control	Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/>
(3) Branch offices	Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/>

2. Explain fully all changes, if any, indicated in Item 1.

Not applicable.

IF THE REGISTRANT IS AN INDIVIDUAL, OMIT RESPONSE TO ITEMS 3, 4, and 5.

3. Have any persons ceased acting as partners, officers, directors or similar officials of the registrant during this 6 month reporting period? Yes ☐ No ☒

If yes, furnish the following information:

Name

Position

Date Connection
Ended

4. Have any persons become partners, officers, directors or similar officials during this 6 month reporting period? ☐ Yes ☒ No

If yes, furnish the following information:

<i>Name</i>	<i>Residence Address</i>	<i>Citizenship</i>	<i>Position</i>	<i>Date Assumed</i>
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5. Has any person named in Item 4 rendered services directly in furtherance of the interests of any foreign principal? Yes ☐ No ☒

If yes, identify each such person and describe his services.

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6. Have any employees or individuals other than officials, who have filed a short form registration statement, terminated their employment or connection with the registrant during this 6 month reporting period? Yes ☒ No ☐

If yes, furnish the following information:

<i>Name</i>	<i>Position or connection</i>	<i>Date terminated</i>
Ewen Gillies	Account Executive	September 30, 1979
Janet Myers	Account Executive	December 31, 1979

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7. During this 6 month reporting period, have any persons been hired as employees or in any other capacity by the registrant who rendered services to the registrant directly in furtherance of the interests of any foreign principal in other than a clerical or secretarial, or in a related or similar capacity? Yes ☐ No ☒

If yes, furnish the following information:

<i>Name</i>	<i>Residence Address</i>	<i>Position or connection</i>	<i>Date connection began</i>
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II - FOREIGN PRINCIPAL

8. Has your connection with any foreign principal ended during this 6 month reporting period?
Yes ☐ No ☒

If yes, furnish the following information:

Name of foreign principal

Date of Termination

-
9. Have you acquired any new foreign principal¹ during this 6 month reporting period? Yes ☐ No ☒

If yes, furnish following information:

Name and address of foreign principal

Date acquired

-
10. In addition to those named in Items 8 and 9, if any, list the foreign principals¹ whom you continued to represent during the 6 month reporting period.
Netherlands Antilles Government
Government of the Island Territory, the Windward Islands
Ghana Tourist Control Board
Mexican National Tourist Council
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III - ACTIVITIES

11. During this 6 month reporting period, have you engaged in any activities for or rendered any services to any foreign principal named in Items 8, 9, and 10 of this statement? Yes ☒ No ☐

If yes, identify each such foreign principal and describe in full detail your activities and services:

Registrant is engaged as public relations counsel in the United States for the purpose of promoting tourism in the Islands of St. Maarten, St. Eustatius and Saba.

Registrant is engaged as public relations counsel in the United States, Canada and the Caribbean for the purpose of promoting tourism in Ghana.

Registrant is engaged as public relations counsel in the North-east area of the United States for the purpose of promoting tourism in Mexico.

¹ The term "foreign principal" includes, in addition to those defined in section 1(b) of the Act, an individual or organization any of whose activities are directly or indirectly supervised, directed, controlled, financed, or subsidized in whole or in major part by a foreign government, foreign political party, foreign organization or foreign individual. (See Rule 100(a)(9)).

A registrant who represents more than one foreign principal is required to list in the statements he files under the Act only those foreign principals for whom he is not entitled to claim exemption under Section 3 of the Act. (See Rule 208.)

12. During this 6 month reporting period, have you on behalf of any foreign principal engaged in political activity² as defined below?

Yes ☐ No ☒

If yes, identify each such foreign principal and describe in full detail all such political activity, indicating, among other things, the relations, interests and policies sought to be influenced and the means employed to achieve this purpose. If the registrant arranged, sponsored or delivered speeches, lectures or radio and TV broadcasts, give details as to dates, places of delivery, names of speakers and subject matter.

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13. In addition to the above described activities, if any, have you engaged in activity on your own behalf which benefits any or all of your foreign principals?

Yes ☐ No ☒

If yes, describe fully.

² The term "political activities" means the dissemination of political propaganda and any other activity which the person engaging therein believes will, or which he intends to, prevail upon, indoctrinate, convert, induce, persuade, or in any other way influence any agency or official of the Government of the United States or any section of the public within the United States with reference to formulating, adopting, or changing the domestic or foreign policies of the United States or with reference to the political or public interests, policies, or relations of a government of a foreign country or a foreign political party.

IV - FINANCIAL INFORMATION

14. (a) RECEIPTS - MONIES

During this 6 month reporting period, have you received from any foreign principal named in Items 8, 9 and 10 of this statement, or from any other source, for or in the interests of any such foreign principal, any contributions, income or money either as compensation or otherwise?

Yes ☒ No ☐

If yes, set forth below in the required detail and separately for each foreign principal an account of such monies.³

<i>Date</i>	<i>From Whom</i>	<i>Purpose</i>	<i>Amount</i>
During reporting period	Ghana Tourist Board	Contract	\$12,500.00
	Netherlands Antilles Government	Contract	41,954.44
	Government of the Island Territory The Windward Islands	Contract	14,741.82
	Mexican National Tourist Council	Contract Reimbursement	24,000.00 8,000.00

Total \$101,196.26

14. (b) RECEIPTS - THINGS OF VALUE

During this 6 month reporting period, have you received any thing of value⁴ other than money from any foreign principal named in Items 8, 9 and 10 of this statement, or from any other source, for or in the interests of any such foreign principal?

Yes ☐ No ☒

If yes, furnish the following information:

<i>Name of foreign principal</i>	<i>Date received</i>	<i>Description of thing of value</i>	<i>Purpose</i>
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³ A registrant is required to file an Exhibit D if he collects or receives contributions, loans, money, or other things of value for a foreign principal, as part of a fund raising campaign. See Rule 201(e).

⁴ Things of value include but are not limited to gifts, interest free loans, expense free travel, favored stock purchases, exclusive rights, favored treatment over competitors, "kickbacks," and the like.

15. (a) DISBURSEMENTS - MONIES

During this 6 month reporting period, have you

(1) disbursed or expended monies in connection with activity on behalf of any foreign principal named in Items 8, 9 and 10 of this statement? Yes ☒ No ☐

(2) transmitted monies to any such foreign principal? Yes ☐ No ☒

If yes, set forth below in the required detail and separately for each foreign principal an account of such monies, including monies transmitted, if any, to each foreign principal.

Date	To Whom	Purpose	Amount
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SEE SCHEDULE I

Total

15. (b) DISBURSEMENTS - THINGS OF VALUE

During this 6 month reporting period, have you disposed of anything of value⁵ other than money in furtherance of or in connection with activities on behalf of any foreign principal named in items 8, 9 and 10 of this statement?

Yes ☐ No ☒

If yes, furnish the following information:

<i>Date disposed</i>	<i>Name of person to whom given</i>	<i>On behalf of what foreign principal</i>	<i>Description of thing of value</i>	<i>Purpose</i>
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(c) DISBURSEMENTS - POLITICAL CONTRIBUTIONS

During this 6 month reporting period, have you from your own funds and on your own behalf either directly or through any other person, made any contributions of money or other things of value⁵ in connection with an election to any political office, or in connection with any primary election, convention, or caucus held to select candidates for political office? Yes ☐ No ☒

If yes, furnish the following information:

<i>Date</i>	<i>Amount or thing of value</i>	<i>Name of political organization</i>	<i>Name of candidate</i>
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V - POLITICAL PROPAGANDA

(Section 1(j) of the Act defines "political propaganda" as including any oral, visual, graphic, written, pictorial, or other communication or expression by any person (1) which is reasonably adapted to, or which the person disseminating the same believes will, or which he intends to, prevail upon, indoctrinate, convert induce, or in any other way influence a recipient or any section of the public within the United States with reference to the political or public interests, policies, or relations of a government of a foreign country or a foreign political party or with reference to the foreign policies of the United States or promote in the United States racial, religious, or social dissensions, or (2) which advocates, advises, instigates, or promotes any racial, social, political, or religious disorder, civil riot, or other conflict involving the use of force or violence in any other American republic or the overthrow of any government or political subdivision of any other American republic by any means involving the use of force or violence.)

16. During this 6 month reporting period, did you prepare, disseminate or cause to be disseminated any political propaganda as defined above? Yes ☐ No ☒

IF YES, RESPOND TO THE REMAINING ITEMS IN THIS SECTION V.

17. Identify each such foreign principal.

⁵ Things of value include but are not limited to gifts, interest free loans, expense free travel, favored stock purchases, exclusive rights, favored treatment over competitors, "kickbacks," and the like.

18. During this 6 month reporting period, has any foreign principal established a budget or allocated a specified sum of money to finance your activities in preparing or disseminating political propaganda?
Yes ☐ No ☒

If yes, identify each such foreign principal, specify amount, and indicate for what period of time.

19. During this 6 month reporting period, did your activities in preparing, disseminating or causing the dissemination of political propaganda include the use of any of the following: **Not applicable**

☐ Radio or TV broadcasts ☐ Magazine or newspaper articles ☐ Motion picture films ☐ Letters or telegrams
☐ Advertising campaigns ☐ Press releases ☐ Pamphlets or other publications ☐ Lectures or speeches
☐ Other (specify) _____

20. During this 6 month reporting period, did you disseminate or cause to be disseminated political propaganda among any of the following groups: **Not applicable**

☐ Public Officials ☐ Newspapers ☐ Libraries
☐ Legislators ☐ Editors ☐ Educational institutions
☐ Government agencies ☐ Civic groups or associations ☐ Nationality groups
☐ Other (Specify) _____

21. What language was used in this political propaganda: **Not applicable**

☐ English ☐ Other (specify) _____

22. Did you file with the Registration Section, Department of Justice, two copies of each item of political propaganda material disseminated or caused to be disseminated during this 6 month reporting period?

Yes ☐ No ☐ **Not applicable**

23. Did you label each item of such political propaganda material with the statement required by Section 4(b) of the Act? Yes ☐ No ☐ **Not applicable**

24. Did you file with the Registration Section, Department of Justice, a Dissemination Report for each item of such political propaganda material as required by Rule 401 under the Act?

Yes ☐ No ☐ **Not applicable**

VI - EXHIBITS AND ATTACHMENTS

25. EXHIBITS A AND B

- (a) Have you filed for each of the newly acquired foreign principals in Item 9 the following:

Exhibit A⁶ Yes ☐ No ☒

Exhibit B⁷ Yes ☐ No ☒

If no, please attach the required exhibit. ~~See cover letter.~~ *not applicable*

- (a) Have there been any changes in the Exhibits A and B previously filed for any foreign principal whom you represented during this six month period?

Yes ☒ No ☐

If yes, have you filed an amendment to these exhibits? Yes ☐ No ☒

If no, please attach the required amendment.

⁶ The Exhibit A, which is filed on Form OBD-67 (Formerly DJ-306) sets forth the information required to be disclosed concerning each foreign principal.

⁷ The Exhibit B, which is filed on Form OBD-65 (Formerly DJ-304) sets forth the information concerning the agreement or understanding between the registrant and the foreign principal.

26. EXHIBIT C

If you have previously filed an Exhibit C⁸, state whether any changes therein have occurred during this 6-month reporting period.

Yes ☐ No ☒

If yes, have you filed an amendment to the Exhibit C? Yes ☐ No ☐

If no, please attach the required amendment.

27. SHORT FORM REGISTRATION STATEMENT

Have short form registration statements, been filed by all of the persons named in Items 5 and 7 of the supplemental statement?

Yes ☐ No ☐ Not applicable

If no, list names of persons who have not filed the required statement.

The undersigned swear(s) or affirm(s) that he has (they have) read the information set forth in this registration statement and the attached exhibits and that he is (they are) familiar with the contents thereof and that such contents are in their entirety true and accurate to the best of his (their) knowledge and belief, except that the undersigned make(s) no representation as to the truth or accuracy of the information contained in attached Short Form Registration Statement, if any, insofar as such information is not within his (their) his (their) personal knowledge.

(Both copies of this statement shall be signed and sworn to before a notary public or other person authorized to administer oaths by the agent, if the registrant is an individual, or by a majority of those partners, officers, directors or persons performing similar functions who are in the United States, if the registrant is an organization.)

(Type or print name under each signature)



Morton Sontheimer

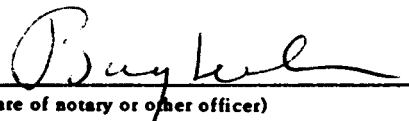


Richard Hazlett

Subscribed and sworn to before me at New York, New York

this 25th day of February, 19 80

BARRY LEE COHEN
NOTARY PUBLIC, STATE OF NEW YORK
No. 5735505
Qualified in Suffolk County
Term Expires March 30, 1980


(Signature of notary or other officer)

⁸ The Exhibit C, for which no printed form is provided, consists of a true copy of the charter, articles of incorporation, association, constitution, and bylaws of a registrant that is an organization. (A waiver of the requirement to file an Exhibit C may be obtained for good cause shown upon written application to the Assistant Attorney General, Criminal Division, Internal Security Section, Department of Justice, Washington, D.C. 20530.

EXPENDITURES FOR NETHERLANDS ANTILLES

July 20, 1979 - January 19, 1980

Travel Fare and Expenses

Jan.	Charge and Ride	
July - Sept.	Pasangrahan Hotel	20.00
	Expense Reports	91.75
Jan.	R. M. Glover	92.20
Jan.	R. Hazlett	95.30
Aug. - Dec.	M. Sontheimer	237.10

Photography

Aug. - Jan.	Wagner International Photos	134.87
Aug. - Oct.	Jack Ward Color Service	20.41

Communications

Aug. - Jan.	Associated Messenger Service	63.40
Oct. - Jan.	ITT Cables	23.64
Aug. - Jan.	N. Y. Telephone	995.34
Aug. - Jan.	Postage	3,874.65
Aug. - Jan.	United Parcel Service	485.13

Office Expense and Subscriptions

Aug. - Nov.	Ambassador Printing Corp.	324.00
July - Sept.	Astoria Office Supply	383.13
Nov.	Bulkley, Dunton, Lindley, Lathrop	78.75
Sept. - Dec.	Grolan Stationers, Inc.	176.95
Aug.	Liberty Supply	8.90
Aug. - Jan.	Petty Cash	33.69
Aug. - Jan.	Xerox Copies	427.50

Outside Services

Aug. - Jan.	Burrelle's Press Clipping Service	572.88
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Business Meetings and Representation

	Expense Reports	
Sept.	E. Gillies	14.14
Nov.	R. Hazlett	135.60
Sept. - Oct.	M. Sontheimer	44.55

TOTAL \$ 8,333.88

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EXPENDITURES FOR MEXICAN NATIONAL TOURIST COUNCIL

July 20, 1979 - January 19, 1980

Travel Fare and Expenses

Aug.	Expense Reports		
	E. Gillies	\$	96.63
Nov.	M. Sontheimer		537.91

Photography

Nov.	R. Fischer		350.00
Aug.	B. Kaplan		100.00
Aug. - Jan.	Wagner International Photos		204.73
Dec.	Jack Ward Color Service		10.91

Communications

Aug. - Jan.	Associated Messenger Service		53.05
Aug. - Jan.	N. Y. Telephone		285.05
Aug. - Jan.	Postage		654.94
Oct.	United Parcel Service		6.42
July - Jan.	Western Union		582.24

Office Expense and Subscriptions

Oct. - Jan.	Grolan Stationers, Inc.		398.95
July - Dec.	Petty Cash		59.99
Nov.	United Nations		6.00
Aug. - Jan.	Xerox Copies		277.05

Outside Services

Aug. - Jan.	Burrelle's Press Clipping Service		692.88
Oct. - Nov.	D. Frifield		3,269.45
Jan.	Mature Temps		29.50
Oct.	D. Miller		107.25
Sept. - Oct.	Penthouse Temporaries		420.00
Sept.	Radio TV Reports		27.75
Nov.	L. Rolan		40.00
Sept.	E. Tonchel		478.50

Business Meetings and Representation

	Expense Reports		
Oct.	E. Gillies		26.00
Dec.	J. Myers		19.06
Aug. - Dec.	M. Sontheimer		408.52

TOTAL	\$	9,142.78
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EXPENDITURES FOR GHANA TOURIST BOARD

July 20, 1979 - January 19, 1980

COMMUNICATIONS

Sept.	ITT Cables	\$	13.72
Sept.-Oct.	N.Y. Telephone		4.03
	Postage		6.67

OFFICE EXPENSE

July - Dec.	Petty Cash		28.20
Aug. - Oct.	Xerox Copies		6.90

OUTSIDE SERVICES

Aug. - Nov.	Burrelle's Press Clipping Service		<u>238.60</u>
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TOTAL	\$	298.12
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July 20, 1979 - January 19, 1980

On behalf of the Mexican Government Tourism Office

Registrant supplied editorial and photographic material to newspapers, magazines and travel industry publications including Travel & Leisure Magazine, Signature Magazine, The New York Post, Bride's Magazine, Newsday, Family Weekly, Travel Weekly and Travel Agent. Registrant supplied materials to NBC-TV's Today Show for segment of foreign travel.

Registrant also arranged visits to Mexico for editors and photographers representing Mademoiselle Magazine, Travel/Holiday Magazine, Essence Magazine, NBC-TV, ABC-TV, Prime Time Magazine, and Travel & Leisure Magazine.

Registrant issued press releases concerning developments in Baja California resorts, Christmas in Mexico, the Yucatan Peninsula, flying private planes in Mexico, the first Miguel Aleman Award and Carnival Festivities in Mexico.

JULY 19, 1979 - JANUARY 19, 1980

ON BEHALF OF THE GHANA TOURIST BOARD

Registrant supplied editorial and photographic material to newspapers, magazines and travel industry publications including TRAVEL & LEISURE MAGAZINE, INCENTIVE MARKETING MAGAZINE, TRAVELAGE MID-AMERICA MAGAZINE, INTERNATIONAL TRAVEL NEWS, DAILY RECORD, GREENWICH BALLOON, and ADVERTISER & ALABAMA JOURNAL.

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JULY 19, 1979 - JANUARY 19, 1980

ON BEHALF OF THE NETHERLANDS ANTILLES WINDWARD ISLANDS

Registrant supplied editorial and photographic material to newspapers, magazines and travel industry publications including PHILADELPHIA EVENING BULLETIN, HOUSTON CHRONICLE, DALLAS MORNING NEWS, NEW YORK SUNDAY NEWS, WOMAN'S DAY MAGAZINE, WEIGHT WATCHER'S MAGAZINE, ARIZONA REPUBLIC, HARTFORD COURANT, NEW YORK SUNDAY TIMES, TRAVEL AND LEISURE MAGAZINE, CLEVELAND PLAIN DEALER, BROWARD LIFE MAGAZINE, CHICAGO TRIBUNE, SAN FRANCISCO EXAMINER, WORCESTER TELEGRAM, SAN JOSE MERCURY-NEWS, LOS ANGELES TIMES, VOGUE MAGAZINE, TORONTO SUN, BALTIMORE SUN, SAILING MAGAZINE and TIMES OF THE AMERICAS MAGAZINE.

Registrant arranged for trips to the islands for journalists, editors and photographers and arranged articles in newspapers and magazines including the NEWSDAY, THE CHRISTIAN SCIENCE MONITOR, TRAVEL SMART NEWSLETTER and JEWISH DIGEST.

Registrant issued press releases concerning construction, new villas, hotel expansion and beaches.

Registrant supplied promotional information and travel statistics to travel agencies, group business sources, airlines, cruise ships and wholesalers including EASTERN, AMERICAN, ALM and CUNARD CRUISE LINES.

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NOTICE

Please answer the following questions and return this sheet in triplicate with your supplemental statement:

1. Is your answer to Item 16 of Section V (Political Propaganda - page 7 of Form OBD-64 - Supplemental Statement):

Yes _____ or No ☒ _____

(If your answer to question 1 is "yes" do not answer question 2 of this form.)

2. Do you disseminate any material in connection with your registration:

Yes ☒ _____ or No _____

(If your answer to question 2 is "yes" please forward for our review copies of all such material including: films, film catalogs, posters, brochures, press releases, etc. which you have disseminated during the past six months.)



Signature

February 19, 1980

Date

Morton Sonthheimer

Please type or print name of signatory on the line above

President

Title